Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Part 90 of the Commission's Rules	)	WP Docket No. 07-100
	)	
	)	
Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band	)	PS Docket No. 06-229
	)	
	)	
Service Rules for the 698-746, 747-762, and 777-792 MHz Bands	)	WT Docket No. 06-150
	)	

COMMENTS OF THE
ALARM INDUSTRY COMMUNICATIONS COMMITTEE

The Alarm Industry Communications Committee ("AICC"), on behalf of its members, hereby submits the following comments on the *Fifth Further Notice of Proposed Rulemaking*[1] ("*FNPRM*"), released June 13, 2012 in the above-captioned proceeding. As detailed below, AICC supports the expansion of eligibility for access and use of the 4.9 GHz bands, for commercial entities that provide public safety-related services. AICC also supports the adoption of technological standards for the 4.9 GHz band.

[1] *In the Matter of Amendment of Part 90 of the Commission's Rules, Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band, Service Rules for the 698-746, 747-762, and 777-792 MHz Bands*, Fourth Report and Order and Fifth Further Notice of Proposed Rulemaking, WP Docket No. 07-100, PS Docket No. 06-229, and WT Docket No. 06-150, released June 13, 2012.

I. Statement of Interest

AICC is comprised of representatives of the Central Station Alarm Association (CSAA), Electronic Security Association (ESA), Security Industry Association (SIA), Bosch Security Systems, Digital Monitoring Products, Digital Security Control, Telular Corp, Stanley Convergent (alarm division, formerly known as Honeywell Monitoring), Honeywell Security, Vector Security, Inc., ADT Security Services, Inc., AES- IntelliNet, Alarm.com, Bay Alarm, Intertek Testing, RSI Videofied, Security Network of America, United Central Control, AFA Protective Systems, Vivint (formerly APX Alarm), COPS Monitoring, DGA Security, Security Networks, Universal Atlantic Systems, Axis Communications, Interlogix, LogicMark, Napco Security, Alarm Detection, ASG Security, Protection One, Security Networks, Select Security, Inovonics, Linear Corp., Numerex, Tyco Integrated Security, FM Approvals, and the Underwriters Laboratories.

CSAA and ESA, representing the alarm monitoring and installation industry sectors, collectively have 2434 member companies providing alarm service to the public. Together with these trade association members, AICC member companies protect a wide range of sensitive facilities and their occupants from fire, burglaries, sabotage and other emergencies. Protected facilities include government offices, power plants, hospitals, dam and water authorities, pharmaceutical plants, chemical plants, banks, schools and universities. In addition to these commercial and governmental applications, alarm companies protect a large and ever increasing number of residences and their occupants from fire, intruders, and carbon monoxide poisoning. Alarm companies also provide medical alert services in the event of medical emergencies.

II. Expansion of Eligibility

AICC supports the expansion of eligibility for access to and use of the 4.9 GHz bands, particularly to safety-related service providers such as alarm companies. Allowing such entities to make use of the 4.9 GHz band not only maximizes the use of the spectrum, but does so in a way that promotes its intended use, which is to further public safety. The public safety community has explored the possibility of having safety-related entities participate in FirstNet on a limited basis, as a way to foster beneficial interoperability and to create a source of additional revenue for FirstNet. If safety-related service providers can operate on the same spectrum as first responders, it can improve their ability to send emergency communications to the public safety broadband network.

Currently, as the Commission notes, non-public safety entities are able to use 4.9 GHz spectrum by entering into sharing agreements with eligible public safety licensees.[2] AICC agrees that expanding eligibility to include, at a minimum, safety-related private sector operations (making a license-sharing agreement unnecessary) would help reduce regulatory burdens and foster cooperation between the public safety community and private sector entities with which it already works hand-in-hand. Alarm service providers are such entities, providing alerts to public safety about fires, home invasions, and medical alerts. Other private sector operations (such as automobile emergency services, and OnStar-type telematics services) may benefit from such limited sharing arrangement.

[2] *FNPRM* at ¶43.

III. Adoption of Technological Standards

AICC also supports the adoption of reasonable technological standards for operation in the 4.9 GHz bands. Use of a standards-based approach helps ensure interoperability, which is of paramount importance to a public safety network (much more so than a purely commercial operation). Indeed, interoperability issues are one of the primary problems the 700 MHz public safety broadband network is intended to address.[3] Use of technical standards would also promote equipment availability and cost effectiveness.

In this regard, any 4.9 GHz technological standard the Commission adopts should be truly uniform. For example, in the *FNPRM*, the Commission notes that it adopted Long Term Evolution (LTE) as the common air interface standard to ensure interoperability in the 700 MHz band.[4] However, it appears to alarm industry equipment manufacturers that the LTE technology used by Verizon differs from the LTE technology used by AT&T or Sprint PCS; therefore, equipment that is designed to use Verizon's LTE services does not necessarily function with AT&T or Sprint PCS networks, even though all of these services are classified as "LTE."[5] This can create significant complications for would be users of FirstNet and the 4.9 GHz band. The Commission must therefore take care to ensure that entities using the 4.9 GHz band, public safety and private sector alike, are able to smoothly transition from one technology to the next as the network evolves over time, and that any standard adopted by the Commission is truly uniform across all networks.

[3] *See, e.g.,* Middle Class Tax Relief and Job Creation Act of 2012 Pub. L. No. 112-96, 126 Stat. 156 (2012). Indeed, the Tax Relief Act even creates an Interoperability Board to ensure network interoperability. *Id.* at § 6203(c)(1)(A).
[4] *FNPRM* at ¶64.
[5] *See, e.g., In the Matter of Promoting Interoperability in the 700 MHz Commercial Spectrum,* Notice of Proposed Rulemaking, WT Docket No. 12-69, FCC 12-31, released March 21, 2012.

At minimum, even if the Commission ultimately decides not to adopt a specific technological standard, interoperability among technologies should be fostered. AICC recognizes that as technology continues to evolve, the possibility of interoperability between technologies grows.

IV. Other Topics of Inquiry

AICC has the following comments on specific questions about implementation of the 4.9 GHz rules, as posed by the Commission in the FNPRM:

- Coordination requirements in the 4.9 GHz spectrum would be appropriate, particularly in the form of a registered database of operations.
- It makes sense to allow the use of the 4.9 GHz band for fixed video operations, such as point-to-point surveillance links, on a primary basis; but the Commission should proceed down this road only if the ultimate chosen bands for the public network also include other frequencies (such as selected frequencies in the 700MHz bands) that can be used on a priority basis for delivery of control signals (including alarm type signals and other supervisory signals).
- Using the 4.9 GHz band for backhaul of 700 MHz traffic, on a primary basis, can be useful if done on an "as available" basis and not take on the primary role of 700MHz data delivery.

V. Conclusion

In light of the forgoing, AICC urges the Commission to expand access to the 4.9 GHz band to private sector entities engaged in safety-related activities such as alarm service providers and alarm monitoring services, in close coordination with FirstNet's vision for participation by private sector entities in the public safety broadband network. AICC also supports the adoption of a uniform technological standard in the 4.9 GHz band. In adopting any standard, the

Commission must take care to ensure that the chosen technology is truly uniform and interoperable.

Respectfully submitted,

THE ALARM INDUSTRY COMMUNICATIONS COMMITTEE

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Dated: October 29, 2012